

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA**

**NORTHERN DIVISION**

**CYNTHIA ELLISON,** )  
 )  
**Plaintiff** )  
 )  
v. ) **Civil Action No.**  
 ) 2:05CV902-B  
**AUBURN UNIVERSITY** )  
**MONTGOMERY,** )  
 )  
**Defendant** )

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on November 21, 2005 by telephone and was attended by:

- Karen S. Rodgers for plaintiff Cynthia Ellison
- Burton F. Dodd for defendant Auburn University Montgomery.

2. Pre-Discovery Disclosures

The parties will exchange by December 15, 2005 the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan

The parties jointly propose to the court the following discovery plan:

- Discovery will be needed on the following subjects: Plaintiff's allegations of harassment, discrimination, and retaliation, and Defendant's defenses to those allegations.
- All discovery commenced in time to be completed by June 15, 2005.
- Maximum of 25 interrogatories by each party to any other party.
- Maximum of 25 requests for admission by each party to any other party.
- Maximum of 6 depositions by plaintiff and 6 by defendant.
- Each deposition limited to maximum of 8 hours unless extended by agreement of parties.
- Reports from retained experts under Rule 26(a)(2) due:
  - from plaintiff by April 15, 2006
  - from defendant by May 15, 2006
- Supplementation under Rule 26(e) due every 30 days, if applicable.

4. Other Items.

The parties do not request a conference with the court before entry of the scheduling order.

- The parties request a pretrial conference in November 2006.
- Plaintiff should be allowed until February 1, 2006 to join additional parties and until February 1, 2006 to amend the pleadings.
- Defendant should be allowed until March 1, 2006 to join additional parties and until March 1, 2006 to amend the pleadings.
- All potentially dispositive motions should be filed by July 15, 2006.
- Settlement cannot be evaluated prior to June 15, 2006.
- Final lists of witnesses and exhibits under Rule 26(a)(3) should be due
  - from plaintiff by October 15, 2006
  - from defendant by November 1, 2006
- Parties should have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

- The case should be ready for trial by December 15, 2006 and at this time is expected to take approximately 5 days.

Dated this 6<sup>th</sup> day of December, 2005.

/s/ Karen S. Rogers  
COUNSEL FOR PLAINTIFF

/s/ Burton F. Dodd  
COUNSEL FOR DEFENDANT